[*] FORM VI. PUBLIC, EDUCATIONAL AND GOVERNMENT USE

Please describe separately:

FORM VI.A. PEG USE CHANNEL CAPACITY

1. The number of forward/downstream channels to be provided, channel number and tier assigned, and date of availability for each PEG channel proposed or, in the alternative, the percentage of the cable system's maximum channel capacity to be provided for PEG use (including storage capacity on video and computer servers).

Comcast currently carries 9 PEG channels in Reston, including the Reston Community Television channel. Comcast believes that a number of the channels are inefficiently utilized and proposes a number of changes that will make more efficient use of the channels it currently provides and leave room for further expansion if specific needs for additional channels are demonstrated.

Our proposal begins with elimination of cable carriage of certain channels that are better suited to other venues, thereby freeing up space for carriage of PEG programming not currently available in Reston that is more appropriate for cable carriage. We propose eliminating the programming currently seen on Channels 27 and 29 and combining the programming on Channels 18 and 19 on a single shared channel, as discussed more fully below.

Channel 29

Channel 29 currently carries the Fairfax County Public Library's bulletin board. We believe that such use of a cable channel may have been reasonable in the early years of cable television in Fairfax County, but is an inefficient use of a cable channel at this point in time, in light of the popularity of the Internet. Our understanding is that 93% of cable subscribers living in Reston own a computer, and 90% of those households have Internet access in their homes. Therefore, an enhanced use of the library's current website at www.fairfaxcounty.gov/library, would meet the needs of the community while imposing far less of a burden upon Comcast. Bulletin boards also may be interspersed between programming on other PEG channels.

[*] The Memorandum on Legal Issues submitted as part of the Proposal sets forth the legal principles governing Comcast's response to this Form.

Channels 18 and 19

Currently, Channel 18 carries programming from George Mason University (GMU) and Channel 19 carries programming from Northern Virginia Community College (NVCC), both consisting primarily of locally-produced telecourses. Preliminary research suggests that the amount of repetition on these channels, coupled with duplication of courses over the Internet, argues for a more efficient use of this bandwidth. Also, in Comcast's Prince William and Arlington County systems, GMU and NVCC share a single channel televising comparable course material. Consolidating the channels appears to satisfy the community need while significantly reducing the current burden on Comcast.

Channel 27

The programming currently carried on this channel is Fairfax Public Access's "radio station," WEBR, which consists primarily of a variety of musical presentations with text messages. The programming is available on the Internet at www.fcac.org/webr. This is perhaps the clearest example of an inappropriate and inefficient use of a PEG channel that should not be allowed to continue.

With the changes we are proposing, the number of PEG channels currently in use in Reston would be reduced to 6. Comcast would then be prepared to make up to 7 additional analog channels available for PEG programming -- a total analog availability of 13 PEG channels -- subject to a reasonable procedure for activating each additional channel that is based on two important factors:

> **(i) a review of the use of the existing PEG channels to ensure that they are substantially programmed, primarily with non-repeat programming, before activation of additional channels is permitted, and**
>
> **(ii) a process for approval by the Board of Supervisors of any activation of an additional PEG channel that would include participation by the public, ensuring that cable customers can play a role in County decisions affecting the channels they receive.**

This potential of up to 13 analog channels for PEG programming is very generous. In fact, in the Washington metropolitan area, there is no other community with a franchise that contains a potential number of analog PEG channels greater than 13. Additionally, Comcast proposes that, if the Reston system becomes an all-digital delivery system, Comcast would continue to make available those 13 channels, in a digital format, and would also make

available to the County an additional 5 digital channels for PEG programming, for a total potential of 18 digital PEG channels.

<u>On-Demand Capability</u>

Additionally, Comcast proposes to work with the County, the schools, community organizations and representatives to mutually determine creative uses of Comcast's on-demand capabilities to augment the PEG channels for more effective presentation of community programming.

2. The spectrum space to be provided for reverse/upstream access uses, and the manner in which the Applicant proposes to provide reverse/upstream capability from locations specified by the County. This description should also delineate the specific equipment to be provided which is associated with signal transmission (i.e., modulators and demodulators).

   The current system is a mid split HFC system. The Reston Community Channel is processed via subchannel modulation and backhauled to the headend, where it is remodulated out to the customer over its designated channel.

   The other PEG channels are backhauled from Cox on the interconnect with Comcast, back to the Comcast headend facility. It is then modulated out over cable television on the designated channel.

3. The method (*e.g.*, fiber or coaxial cable) by which the access facilities and the headend will be linked. The description should include the channel capacity in both forward and reverse directions to be provided between the locations.

   The access facilities and the headend are linked by the mid split HFC system. The I-Net capacity is 30 channels forward and 17 channels reverse. There are currently 6 forward channels activated.